

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

UNITED STATES OF AMERICA

v.

MARIO MARES

No. 6:23-MJ-027-BU-1
ECF

MOTION FOR PRETRIAL DETENTION AND CONTINUANCE

The United States asks for the pretrial detention of Defendant under Title 18,
United States Code, Sections 3142(e) and 3142(f).

1. **Eligibility of Case.** This case is eligible for a detention order under 18 U.S.C. § 3142(f) because it is a case that involves both:
 - (1) a felony that involves the possession or use of a firearm, destructive device, or any other dangerous weapon (18 U.S.C. § 3142(f)(1)(E)); and
 - (2) A serious risk defendant will obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate a prospective witness or juror (18 U.S.C. § 3142 (f)(2)(B)).
2. **Reason for Detention.** The Court should detain defendant, under 18 U.S.C. § 3142(e), because no condition or combination of conditions will reasonably assure
 - (1) the defendant's appearance as required; and
 - (2) The safety of any other person and the community.
3. **Rebuttable Presumption.** The United States will not invoke the rebuttable presumption against defendant under 18 U.S.C. § 3142(e).
4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing after a continuance of three days.

Respectfully submitted,

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s/ Stephen J. Rancourt

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